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11

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 JASON HALPERN,

15 Plaintiff,

16 vs.

17 GARY THARALDSON,

18 Defendant.

Case No. 2:15-cv-02037-JCM-GWF

19

20 **STIPULATION TO EXTEND TIME
FOR PLAINTIFF TO FILE
OPPOSITION TO MOTION TO
DISMISS (Dkt. # 28) (FIRST
REQUEST) AND /PROPOSED/
ORDER GRANTING EXTENSION OF
TIME**

21 Pursuant to Local Rule 6-1, Plaintiff Jason Halpern, by and through his undersigned
22 counsel, and Defendant Gary Tharaldson, by and through his undersigned counsel, hereby submit
23 this stipulation to extend Plaintiff's deadline to oppose Defendant's Motion to Dismiss (Dkt. #
24 28), which was filed on November 20, 2015.¹

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28 ¹ For purposes of this Stipulation, Plaintiff Halpern and Defendant Tharaldson is each a
“Party” and collectively referred to herein as the “Parties.”

The current deadline for Plaintiff to file its Opposition is December 7, 2015. Based on the intervening Thanksgiving holiday and the schedule of Plaintiff's counsel, Plaintiff has requested an extension up to and including December 22, 2015 in order to file its Opposition to Defendant's Motion to Dismiss (Dkt. # 28). No prior extensions have been requested in relation to this deadline. Defendant stipulates and agrees to this extension up to and including December 22, 2015.

Additionally, based on the intervening Christmas holiday and the schedule of Defendant's counsel, the Parties stipulate and agree that the deadline for Defendant's Reply brief be extended up to and including January 12, 2016.

DATED this 4th day of December, 2015.

RICE REUTHER SULLIVAN & CARROLL, LLP

By: /s/ Anthony J. DiRaimondo, Esq.
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ORDER

Having considered the foregoing, and good cause appearing,

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that the Parties' Stipulation to Extend Time for Plaintiff to File Opposition to Motion to Dismiss (Dkt. # 28) (First Request) is GRANTED.

IT IS SO ORDERED.

DATED December 9, 2015.

James C. Mahan
U.S. DISTRICT JUDGE

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CERTIFICATE OF SERVICE

Pursuant to Fed.R.Civ.P. 5(b), and Section IV of District of Nevada Electronic Filing Procedures, I certify that I am an employee of Rice Reuther Sullivan & Carroll, LLP, and that a true and correct copy of the **STIPULATION TO EXTEND TIME FOR PLAINTIFF TO FILE OPPOSITION TO MOTION TO DISMISS (Dkt. # 28) (FIRST REQUEST) AND [PROPOSED] ORDER GRANTING EXTENSION OF TIME** was served via electronic service; via CM/ECF, on this 4th day of December, 2015, to the address(es) shown below:

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